



SAN JOAQUIN COUNTY

FLOOD CONTROL & WATER CONSERVATION DISTRICT

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March 18, 2004

Mr. Paul Dabbs and
Mr. Kamyar Guivetchi
The Department of Water Resources
901 P Street
Sacramento, California 95814

SUBJECT: COMMENTS REGARDING THE DEPARTMENT OF WATER RESOURCES
BULLETIN-160 CALIFORNIA WATER UPDATE 2003

Dear Mr. Dabbs and Mr. Guivetchi:

On behalf of the San Joaquin County Flood Control and Water Conservation District Advisory Water Commission (Commission), we would like to convey constructive comments regarding the Department of Water Resources Bulletin-160 California Water Update 2003 process. The following items were recommended at the Commission meeting on March 17, 2004:

Overdraft of the Eastern San Joaquin County Sub-Basin is well documented in Bulletin-118-80 and other groundwater investigations. Severe overdraft conditions estimated at approximately 200,000 acre-feet per year have earned the Eastern San Joaquin County Sub-Basin's designation as "critically overdrafted." Historic groundwater overdraft is largely attributed to the preemption of surface water supplies by exporters over local needs. Water Code Section 10004.6 (c)(2) requires Bulletin-160 to address, "Groundwater supplies, including estimates of sustainable yield, supplies necessary to recover overdraft basins, and supplies lost due to pollution and other groundwater contaminants." The Commission insists that the Department of Water Resources incorporate into Draft Bulletin-160 water supply planning information for the recovery of the Eastern San Joaquin County Sub-Basin and other such basins in overdraft, pursuant to Water Code Section 10004.6 (c)(2).

Assembly Bill 2587 requires that the Department of Water Resources consider in Bulletin-160 information pertaining to the food, fiber, livestock, and other farm product demands of the State and the nation. California farm production is a critical component to the health and welfare of the National and International food supply and to the economy of the State. A safe and secure water supply will enable California to produce the necessary food supply in order to avoid dependency on a net import of foreign foods. The Commission suggests that Draft Bulletin-160 include a strategy to meet current and future agricultural water demands rather than assume agriculture must succumb to development pressure, substantial land fallowing, and forced water transfers from agriculture lands for urban uses.

Bulletin-160-98 predicted water shortages of up to 6.2 million acre-feet in dry years. With this in mind, it is agreeable that effectively managing current water supplies through conjunctive use, water recycling, and water transfers have their place in California's water future. However, without new surface storage to capture wet year water, shortages will only create more animosity between competing water demands.

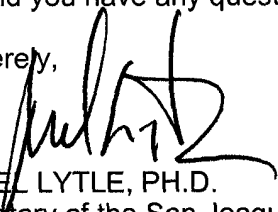
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Reallocating a 6.2 million acre-feet water shortage between agricultural, environmental, and urban uses is not sustainable. The Advisory Water Commission strongly suggests that additional surface storage be an indispensable component to future California water supplies.

Thank you for the opportunity to comment on Draft Bulletin-160 California Water Plan Update 2003. Should you have any questions, please contact me at (209) 468-3089.

Sincerely,



C. MEL LYTLE, PH.D.
Secretary of the San Joaquin County
Flood Control and Water Conservation District

CML:THM:tee

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c: Advisory Water Commissioners
Alex Hildebrand, South Delta Water Agency
T. R. Flinn, Director of Public Works
Tom Gau, Deputy Director/Development